

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA §  
§  
V. § CAUSE NO. SA-20-mj-1128  
JAYLYN CHRISTOPHER §  
MOLINA §

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE  
PRELIMINARY AND DETENTION HEARING

TO THE HONORABLE RICHARD B. FARRER, UNITED STATES MAGISTRATE JUDGE  
FOR THE WESTERN DISTRICT OF TEXAS:

Defendant JAYLYN CHRISTOPHER MOLINA, by and through his undersigned attorney,  
files this Unopposed Motion to Continue Preliminary and Detention Hearing, and would show  
this Honorable Court as follows:

I

This case is currently set for a Preliminary and Detention hearing on Monday, September  
28, 2020. The undersigned respectfully requests a one (1) day continuance until, so that counsel  
can further investigate detention matters. Furthermore, Defense Counsel is on scheduled leave  
that day.

II

Counsel for the Government, Assistant United States Attorney Mark Roomberg, has  
indicated that he does not oppose a continuance.

III

Defendant acknowledges that any continuance granted in this cause is excludable under  
the Speedy Trial Act as delay resulting from a continuance granted at the request of defense

counsel because the ends of justice served by the continuance outweigh the interest of the public in a Speedy Trial. 18 U.S.C. § 3161(h)(7)(A).

FOR THESE REASONS, Defendant prays this Honorable Court will continue the above-styled and numbered cause for one (1) day.

Respectfully submitted.

MAUREEN SCOTT FRANCO  
Federal Public Defender

/s/DAVID J. KIMMELMAN  
Assistant Federal Public Defender  
727 E. César E. Chávez Blvd., Suite B-207  
San Antonio, Texas 78206-1205  
State Bar No. 11427300  
Tel.: 210-472-6700  
Fax: 210-472-4454

*Attorney for Defendant*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of September, 2020, I electronically filed the foregoing Defendant's Unopposed Motion to Continue Preliminary and Detention Hearing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Mark Roomberg  
Assistant United States Attorney  
601 N. W. Loop 410, Suite 600  
San Antonio, Texas 78216

/s/ DAVID J. KIMMELMAN  
*Attorney for Defendant*

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

## ORDER

On this date came on to be considered the Defendant's Unopposed Motion to Continue Preliminary and Detention Hearing, and the Court having considered the premises, is of the opinion that the same should be and is hereby GRANTED.

It is therefore ORDERED that the Preliminary and Detention Hearing be continued in the above-styled and numbered cause for one (1) day.

It is ORDERED that a new schedule be set by separate order.

The Court finds that, for the reasons set out in the Defendant's motion, the ends of justice served by the continuance granted by this order outweigh the interest of the public in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED on this the \_\_\_\_\_ day of September, 2020.

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**RICHARD B. FARRER**  
United States Magistrate Judge